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Andy Liu <andy@quan.legal>

5:20-cv-09098-NC - Request for waiver of service of Summons under FRCP 4(d)

Andy Liu <andy@quan.legal>
To: LEON JEW <leon.jew@dahyee.com>
Cc: Alice Chao <alice.chao@dahyee.com>, "Ljewpt@gmail.com" <Ljewpt@gmail.com>, Tyson Lin <tyson.lin@dahyee.com>, Lauren Quan <lauran@quan.legal>, Andrew Quan <andrew@quan.legal>

Thu, Dec 17, 2020 at 3:29 PM

Good afternoon Mr. Jew,

We filed a civil complaint (5:20-cv-09098-NC) against the various entities to which your representation in the Talece will probably extend.

We are not sure about the business hours of some of the corporate defendants due to Covid-19 restrictions current in place in the Santa Clara County, and thus respectfully request, pursuant to FRCP 4(d), that these defendants accept service by returning a signed copy of the Notice Of Lawsuit And Request To Waive Service Of Summons, an example of which is provided below:

https://cand.uscourts.gov/wp-content/uploads/forms/civil-forms/AO_398.pdf.

Please let us know whether the potential defendants intend to comply with FRCP 4(d). If Defendants fail to comply with Rule 4(d), we will ask the court to award attorney fees and costs for effectuating the service of summons.

Thank you.
Andy Liu

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Andy Liu <andy@quan.legal>

5:20-cv-09098-NC - Request for waiver of service of Summons under FRCP 4(d)

LEON JEW <leon.jew@dahyee.com>

Fri, Dec 18, 2020 at 12:30 PM

To: Andy Liu <andy@quan.legal>, Lauren Quan <lauren@quan.legal>
Cc: Alice Chao <alice.chao@dahyee.com>, Tyson Lin <tyson.lin@dahyee.com>

Hi Andy,

It seems that you know the defendants quite well -- **none of them is my client**. It was my first time hearing some of the names.

I know nothing about which lawyer(s) will represent them.

Happy Holiday!

Leon

From: Andy Liu <andy@quan.legal>

Sent: Friday, December 18, 2020 12:16 PM

To: LEON JEW <leon.jew@dahyee.com>; Lauren Quan <lauren@quan.legal>

Cc: Alice Chao <alice.chao@dahyee.com>; Tyson Lin <tyson.lin@dahyee.com>

Subject: Re: Fw: 5:20-cv-09098-NC - Request for waiver of service of Summons under FRCP 4(d)

[Quoted text hidden]

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Andy Liu <andy@quan.legal>

2nd Request for a meet and confer re attorney fee and cost under Rule 4 - 5:20-cv-09098-EJD BuildSimHub Inc. v. Beijing Jianyi Investment Development (Group) Co. Ltd. et al Notice of Appearance

Andy Liu <andy@quan.legal>

Thu, Feb 4, 2021 at 7:09 PM

To: LEON JEW <Leon.Jew@dahyee.com>, Alice Chao <alice.chao@dahyee.com>, Ljewpt@gmail.com, Tyson Lin <tyson.lin@dahyee.com>

Cc: Andrew Quan <andrew@quan.legal>, Lauren Quan <lauran@quan.legal>

Mr. Jew,

When are you available for a meet and confer re Plaintiff's request for Defendants to pay attorney fee and cost after Defendants were notified, but refused to waive service. This is our second request to meet and confer. We hope to resolve this issue without a motion.

I am available tomorrow for the most of the day.

Thank you.
Andy Liu

----- Forwarded message -----

From: <ECF-CAND@cand.uscourts.gov>

Date: Thu, Feb 4, 2021 at 9:43 AM

Subject: Activity in Case 5:20-cv-09098-EJD BuildSimHub Inc. v. Beijing Jianyi Investment Development (Group) Co. Ltd. et al Notice of Appearance

To: <efiling@cand.uscourts.gov>

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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U.S. District Court

California Northern District

Notice of Electronic Filing

The following transaction was entered by Jew, Leon on 2/4/2021 at 9:43 AM PST and filed on 2/4/2021

Case Name: BuildSimHub Inc. v. Beijing Jianyi Investment Development (Group) Co. Ltd. et al

Case Number: 5:20-cv-09098-EJD

Filer: Jianyi Investment and Development Inc.

Document Number: 23

Docket Text:

NOTICE of Appearance by Leon Emmanuel Jew (Jew, Leon) (Filed on 2/4/2021)

5:20-cv-09098-EJD Notice has been electronically mailed to:

Leon Emmanuel Jew Leon.Jew@dahyee.com, alice.chao@dahyee.com, Ljewpt@gmail.com, tyson.lin@dahyee.com

Zheng Liu Andy.Liu@aptumlaw.us, andrew@quan.legal, andy@quan.legal, lauran@quan.legal, zz24tc@gmail.com

5:20-cv-09098-EJD Please see Local Rule 5-5; Notice has NOT been electronically mailed to:

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: C:\fakepath\Notice of Appearance 9098.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=2/4/2021] [FileNumber=17760374-0]
[0c02bb6946839a529fd605af30c1f3104387774883da546ecc021b819415c3b4f6fc4
d36d63adf0bc21e9f67112e20f35d03a31f98452fd3b6e858113f9ef617]]

EXHIBIT D

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LAFFEY MATRIX

Year	Adjustmt Factor**	Paralegal/ Law Clerk	Years Out of Law School *				
			1-3	4-7	8-10	11-19	20 +
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07- 5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06- 5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/01/05- 5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/01/04- 5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/01/03- 6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/01/02- 5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/01/01- 5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/01/00- 5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468